

EXHIBIT "C"

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

Intellectual Ventures II LLC,

*Plaintiff and
Counter-Defendant,*

v.

BITCO General Insurance Corp., f/k/a,
Bituminous Casualty Corp.; and BITCO
National Insurance Co., f/k/a Bituminous
Fire and Marine Insurance Co.,

*Defendants and
Counterclaimants.*

Case No. 6:18-CV-00298-JRG

LEAD CASE

Intellectual Ventures II LLC,

*Plaintiff and
Counter-Defendant,*

v.

Great West Casualty Company,

*Defendant and
Counterclaimant.*

Case No. 6:18-CV-00299-JRG

GREAT WEST CASUALTY COMPANY'S LIST OF TRIAL WITNESSES

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure and the Court's Second Amended Docket Control Order (Dkt No. 197), Defendant Great West Casualty Company ("Defendant") respectfully submits the following list of witnesses that it expects to present at trial and those that it may call at trial if the need arises (either in person, through deposition designations, or through videotaped deposition).

Defendant submits this witness list without waiving any of its rights, including the right to supplement or amend the list prior to or during trial, and including the right to: (a) not call some of the witnesses listed below, (b) call live or by deposition any witness identified on Plaintiff's witness lists, (c) call live any witnesses necessary to authenticate or lay the foundation for the introduction of documents to which Plaintiff objects, (d) add additional witnesses to testify live or by deposition, (e) introduce deposition testimony as impeachment evidence or in rebuttal, (f) call as live witnesses at trial the corporate representative(s) designated by Plaintiff to be excluded from the Rule, whether or not that person appears on a witness list, (g) change a witness from a live witness to one testifying by deposition and vice versa, (h) modify this witness list if any further depositions are taken in this matter, or (i) modify, amend, or supplement this witness list in response to rulings by the Court. Defendant reserves the right to call as a witness any person identified on the witness list submitted by Plaintiff without waiving any right to object to Plaintiff's presentations of such witnesses at trial, without waiving any objections to the admissibility of any such testimony, and without waiving the right to move for the exclusion of any such testimony. Defendant also may call witnesses not included on this list in rebuttal. The inclusion of witnesses on this list is subject to Defendant's motions to exclude, Defendant's motions in limine, and other pre-trial motions.

WITNESS	Will Call Live	May Call Live	May Call by Deposition
Chris Bakewell	X		
Key Coleman	X		
Dr. Mark Crovella	X		
Brian Foote	X		
Jim Arends		X	
Michael Flannery		X	
Steve Ponder		X	
Steve Isaac		X	X
Larry Davis			X
Cheryl Fennesy			X
David Gaertner			X
Thomas Choi			X
Ashley Flynn			X
John Knapp			X
Joe Kosiara			X
Tracy Lemke			X
Don Merino			X
Nathan Myhrvold			X
Everado Ruiz			X
Edward Snyders			X
Chris Spadea			X
Cory Van Arsdale			X
Jim Weisfield			X

Dated: January 4, 2019

/s/ Irene Yang

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Casualty Corp.; BITCO National
Insurance Co., f/k/a Bituminous Fire and
Marine Insurance Co.; and Great West
Casualty Company*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record have been served with the foregoing document by electronic mail on this 4th day of January, 2019.

/s/ Julia Alvarez-Tam
Julia Alvarez-Tam